

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

IN RE: James L Birdsall, Jr.

CHAPTER 13
CASE NO. 19-60231

Debtor(s)

ATTORNEY FEE APPLICATION

Comes now the Debtor's Attorney, and makes application for additional Attorney's fees on the basis of the following information:

1. The Debtor(s) filed a bankruptcy petition before this Court on **February 4, 2019**, at which time the Debtor(s) executed a fee agreement whereby the Debtor's Attorney agreed to represent the Debtor for a set fee through confirmation. Specifically excluding other unanticipated litigation or motions.
2. That the Debtor(s) have requested that their Attorney file a Petition for the Sale of Real Estate with this Court, which said Petition had to be noticed to creditors and prepared for hearing.
3. That the Debtor(s) agree that their Attorney is due additional fees in the amount of **\$400.00** for the following:
 - a. Attorney: met with client regarding the motion; review of the Petition for the Sale of Real Estate, Notice of Hearing, and Attorney's Fee Application; discussion with staff regarding the petition; and appearance in court on **December 19, 2019**.
 - b. Office staff: typing the Petition for the Sale of Real Estate, Notice of Hearing, and Attorney's Fee Application for attorney to review; Discussions with Attorney and Settlement Company regarding the amount due to the Debtor out of the sale proceeds; and discussions with Debtor to clarify issues related to sale.

Therefore, the Debtor(s) and their Attorney hereby request the Court to enter an order confirming the additional Attorney's fees, and that said fees shall be paid by the chapter 13 trustee.

Dated: 11/20/19

Respectfully submitted,
James L Birdsall, Jr.
/s/ Stephen E. Dunn
Of Counsel

Stephen E. Dunn, Esq., VSB No. 26355
Michelle J. Dunn, Esq., VSB No. 90687

Stephen E. Dunn, PLLC
201 Enterprise Dr., Suite A
Forest, Va. 24551
Phone: 434-385-4850
Email: stephen@stephendunn-llc.com
michelle@stphendunn-llc.com

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**NOTICE OF HEARING ON DEBTOR'S PETITION TO SELL REAL ESTATE AND
ATTORNEY FEE APPLICATION**

Please take notice that the above-named Debtor(s) have filed a Petition to Sell Real Estate and Attorney fee application, a true copy of which are attached hereto, and shall submit the same to the Honorable Rebecca B. Connelly, Bankruptcy Judge, for approval and confirmation on ***December 19, 2019***, at ***9:30 a.m.***, or as soon thereafter as the parties may be heard in the U.S. Bankruptcy Court, 1101 Court Street, Lynchburg, VA 24504, Courtroom 210.

Objections to said Petition to Sell Real Estate must be filed in writing, with copies thereof served on the Trustee and Counsel for the Debtor(s), no later than five days prior to the hearing date, in order to be heard on ***December 19, 2019***.

I do hereby certify that a copy of this Notice and Motion have been sent to the Chapter 13 Trustee by ECF Mail, to the Debtor and all creditors by first class postage prepaid mail in this case on the after mentioned date.

Dated: 11/20/19

Respectfully submitted,
James L Birdsall, Jr.
/s/ Stephen E. Dunn
Of Counsel

Stephen E. Dunn, Esq., VSB No. 26355
Michelle J. Dunn, Esq., VSB No. 90687
Stephen E. Dunn, PLLC
201 Enterprise Dr., Suite A
Forest, Va. 24551
Phone: 434-385-4850
Email: stephen@stephendunn-llc.com
michelle@stphendunn-llc.com